

EXHIBIT D

JILL DILLARD V. CITY OF SPRINGDALE
DUGGAR, JOY on 08/30/2021

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD, PLAINTIFFS

JINGER VUOLO, and JOY DUGGAR

V. CASE NO. 5:17-CV-05089-TLB

CITY OF SPRINGDALE, ARKANSAS; DEFENDANTS

WASHINGTON COUNTY, ARKANSAS;

KATHY O'KELLEY, in her individual and
official capacities;

ERNEST CATE, in his individual and official
capacities; RICK HOYT, in his individual and
official capacities; STEVE ZEGA, in his official
capacity; DOES 1-10, inclusive

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION OF
JOY ANNA DUGGAR FORSYTH
AUGUST 30, 2021

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION
of JOY ANNA DUGGAR FORSYTH, produced as a witness at the
instance of the Defendants, and duly sworn, was taken in
the above-styled and numbered cause on the 30th day of
August, 2021, from 10:01 a.m. to 3:38 p.m., before
Natanya Riddle, CCR in and for the State of Arkansas,
reported by machine shorthand method in Fayetteville,
Arkansas (virtually), pursuant to the Federal Rules of
Civil Procedure and the provisions stated on the record.

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A P P E A R A N C E S

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**JILL DILLARD V. CITY OF SPRINGDALE
DUGGAR, JOY on 08/30/2021**

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1 THE VIDEOGRAPHER:

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2 ARKANSAS REALTIME REPORTING

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3 Fayetteville, Arkansas 72703

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5 ALSO PRESENT:

Ms. Kathy O'Kelley - Via Videoconference

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1 that up was that it felt like there was more paparazzi
2 after these disclosures. Is that fair?

3 A. Yes.

4 Q. Okay.

5 A. Yeah, we -- I mean, day-to-day life, there's not
6 paparazzi ever.

7 Q. Where does your relationship with Josh stand as we
8 sit here today?

9 A. Could you be, I guess, more specific than that?

10 Q. Sure. When was the last time you saw Josh?

11 A. It would have been probably three or four months
12 ago.

13 Q. Okay. Why didn't you sue Josh in this lawsuit?

14 MR. BLEDSOE: Object to the form.

15 Joy, you don't need to answer that
16 question.

17 THE WITNESS: Okay.

18 MR. OWENS: I'm going to ask the court
19 reporter to certify that question.

20 What's your basis, Steve, for instructing
21 your client not to answer the question?

22 MR. BLEDSOE: Attorney work product,
23 attorney-client privilege.

24 MR. OWENS: Okay.

25 Q. (BY MR. OWENS) Let me just preface the remainder of

1 my questions with -- with these statements: None of my
2 questions are intended to inquire about any
3 conversations you've had with any of your lawyers.

4 Okay? Do you understand that?

5 A. Yeah.

6 Q. Okay. Have you ever considered suing your brother?

7 A. No.

8 Q. Why not?

9 MR. BLEDSOE: And, Joy, I'm going to
10 instruct you not to answer to the extent any
11 discussion or anything you state relates to a
12 discussion that you've had with any of the
13 lawyers on this case or among your sisters
14 after discussing the matter with lawyers.

15 THE WITNESS: Okay.

16 MR. BLEDSOE: Based on what the lawyers
17 have discussed.

18 THE WITNESS: Yeah. Okay.

19 Q. (BY MR. OWENS) You may answer.

20 A. I -- I don't know what to say, I guess. I don't
21 know.

22 Q. It's just never been something that you've
23 considered, right?

24 A. Yeah.

25 Q. Have you forgiven Josh?

1 A. Yeah.

2 Q. Why?

3 MR. BLEDSOE: Object to the form.

4 A. I think forgiving and trusting are two completely
5 different things; and I have forgiven him so that I feel
6 like if I become bitter over it, then that's going to
7 make my life worse. It's not going to do anything for
8 me. And -- but I think forgiving and trusting are
9 different things and, yes, I've forgiven him for what
10 he's done to me, but I don't trust him.

11 Q. (BY MR. OWENS) Gotcha.

12 You mentioned these negative comments on
13 the Internet directed at you and your family on various
14 levels.

15 Have you ever received any messages of
16 support from any source?

17 A. People supporting me?

18 Q. Yes.

19 A. Yes.

20 Q. Lots of them, right?

21 MR. BLEDSOE: Object to the form.

22 A. A good amount.

23 Q. (BY MR. OWENS) People from all over the country and
24 the world message you to tell you they're praying for
25 you and they stand with you and those kinds of things,

1 because they were the only two that were married?

2 A. Yeah. Yeah.

3 Q. Wasn't Josh married?

4 A. Yes, but he was not involved anymore.

5 Q. Okay. Do you think that the fact of a child sexual
6 offense is of legitimate public concern?

7 MR. BLEDSOE: Object to the form.

8 A. Can you restate that?

9 Q. (BY MR. OWENS) Sure.

10 Do you think the public should be
11 concerned about sex offenses against minors?

12 MR. BLEDSOE: Object to the form.

13 A. Yes.

14 Q. (BY MR. OWENS) The public is concerned about sex
15 offenses against minors, aren't they?

16 A. Yeah.

17 Q. In what ways have you sought solitude or seclusion
18 in your life?

19 MR. BLEDSOE: Object to the form.

20 A. Do you mean, like, finding ways to, like, relax and
21 stuff? Or what --

22 Q. (BY MR. OWENS) Well -- so you've been on TV for
23 most of your life. That seems to me to not be a very
24 secluded life or a life of solitude.

25 Have you ever sought solitude or

1 Q. (BY MR. OWENS) You may answer.

2 A. Oh, okay. "Physical" as being, like, bodily or,
3 like, monetarily or...

4 Q. Well, let's take them in turn.

5 How about bodily first?

6 A. No.

7 Q. How about monetarily?

8 A. Yes.

9 MR. BLEDSOE: Object to the form.

10 Q. (BY MR. OWENS) What monetary injuries have you
11 suffered as a result of these disclosures?

12 A. Uncounted number of -- I do advertising online and
13 I have lost multiple deals because of it, being a
14 majority of them, actually.

15 Q. Okay. So I asked you before if you worked outside
16 the home and you -- you told me no, and that's because
17 you work inside the home?

18 A. Yes, I guess, yeah. I work from home.

19 Q. That's okay. So what do you do for income?

20 A. I do advertising on -- online.

21 Q. How does that work? I've always been a little bit
22 curious about that. How does that work?

23 A. I have companies -- either I reach out to companies
24 or they reach out to me and -- to promote different
25 products.

1 Q. What kinds of products?

2 A. Could be beauty, could be, you know, baby stuff,
3 home supplies, electronics, pretty much anything.

4 Q. And what's your role in marketing or promoting
5 those products?

6 A. I normally take pictures and post them with, like,
7 links for people to -- to use to get, you know, a
8 discount.

9 Q. Okay. Okay.

10 AUTOMATED MESSAGE: It's 12:00 o'clock.

11 Q. (BY MR. OWENS) How long have you been doing that?

12 A. I've been doing that since I was -- I think I was
13 almost 18.

14 Q. Okay. So any other sources of income for you
15 personally?

16 A. Nothing huge, I guess, no. I do some YouTube
17 videos just on, like, DIY projects or family life, but
18 other than that, no.

19 Q. And my understanding is -- because I've never done
20 this. My understanding is that YouTube pays based on
21 the number of views. If you have a really large number
22 of views, they pay you some amount, right?

23 A. Yeah, depending on if you have ads on there or not.

24 Q. I see. Okay.

25 What was your income for 2020, just

1 ballpark?

2 A. Just for me?

3 Q. Yeah.

4 A. It was probably around 40,000.

5 Q. Okay. Your -- how did that compare to the years
6 before that?

7 MR. BLEDSOE: Object to the form.

8 Q. (BY MR. OWENS) Has it built up over time?

9 A. Pardon?

10 Q. Has that built up over time?

11 A. Because I've been proactive in it, it has. But
12 it's also really hard to get new people to do
13 advertisings with me. Or they'll -- they'll start and
14 then they'll cut it off.

15 Q. Okay. Okay. Your husband works as well?

16 A. Yes, sir.

17 Q. What does he do?

18 A. He's a commercial contractor.

19 Q. Oh, okay. There in Northwest Arkansas?

20 A. Yes, sir.

21 Q. Okay. What's the name of his company?

22 A. Red Oak Homes. He builds new homes right now.

23 Q. Oh, I see. Okay. Residential construction?

24 A. Yes, sir.

25 Q. Okay.

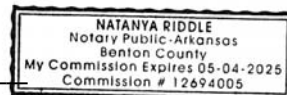
COURT REPORTER CERTIFICATION

I, NATANYA RIDDLE, Certified Court Reporter and Notary Public in and for the State of Arkansas, do hereby certify that prior to the commencement of the examination, JOY ANNA DUGGAR FORSYTH was duly sworn by me to testify to the truth, the whole truth, and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place, and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative, nor employee, nor attorney to any of the parties in this action, and that I am neither a relative, nor employee of such attorney or counsel, and that I am not financially interested in the action.

Natanya Riddle



NATANYA RIDDLE, CCR, RPR

LS Certificate #766, State of Arkansas

Notary Public in and for the State of Arkansas

Dated: September 16, 2021

